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6 FCA US, LLC and CJM AUTOMOTIVE GROUP, INC.

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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10 ANGELA P. SPEGAL, an individual; ) CASE NO.: 1:20-CV-00361-NONE-JLT  
11 and KRISTOPHER G. HAIL, an )  
individual; )  
12 Plaintiffs, )  
13 vs. )  
14 CJM AUTOMOTIVE GROUP, INC., a ) JOINT STIPULATION TO EXTEND  
15 California Corporation; FCA US LLC, a ) TIME FOR DEFENDANT CJM  
16 Delaware Limited Liability Company; ) AUTOMOTIVE GROUP, INC. TO  
and DOES 1 through 75, inclusive; ) RESPOND TO PLAINTIFFS'  
17 Defendants. ) COMPLAINT; [PROPOSED] ORDER  
18 ) (Doc. 5)

19  
20 Plaintiffs Angela P. Spegal and Kristopher G. Hail ("Plaintiffs") and  
21 Defendants FCA US, LLC, a Delaware Limited Liability Company ("FCA US")  
22 and CJM Automotive Group, Inc. ("CJM"), (collectively "the Parties") by and  
23 through their counsel of record, hereby agree and stipulate as follows:

24 **STIPULATION**

25 1. On January 31, 2020 Plaintiff commenced an action in the Superior  
26 Court of California in and for the County of Kern titled *Angela P. Spegal and*  
*Kristopher G. Hail v. FCA US, LLC et al.* as Case No. BCV-20-100311 ("the  
27 Action").

1       2. On or about March 9, 2020, Defendant FCA US, LLC answered in  
2 state court and filed a Notice of Removal of the Action to this Court Pursuant to  
3 28 U.S.C. section 1441(b), based upon diversity jurisdiction.<sup>1</sup>

4       3. Plaintiff served CJM on or about February 28, 2020, and CJM's  
5 responsive pleading was scheduled, therefore, to be due on or before March 30,  
6 2020.

7       4. On March 30, 2020, the parties stipulated to extend CJM's responsive  
8 pleading deadline to April 16, 2020.

9       5. On April 15, 2020, the parties stipulated that CJM may have  
10 additional time within which to answer or otherwise respond to Plaintiffs'  
11 Complaint. Therefore, the last day for CJM to answer or otherwise respond to  
12 Plaintiffs' Complaint is now Thursday, May 6, 2020.

13       6. Good cause exists for this extension as defense counsel has just  
14 recently, through its representation of FCA US, reached an agreement to indemnify  
15 CJM in this matter. As such, defense counsel will need time to become  
16 knowledgeable about CJM's sales and service files to prepare an initial pleading.

17       This document is being electronically filed through the Court's ECF System.  
18 In this regard, counsel for FCA US and CJM hereby attests that (1) the content of  
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28       <sup>1</sup> CJM Automotive Group, Inc., a California Corporation has not yet appeared in this action.

1 this document is acceptable to all persons required to sign the document; (2)  
2 Plaintiffs' counsel has concurred with the filing of this document; and (3) a record  
3 supporting this concurrence is available for inspection or production if so ordered.

4 DATED: April 15, 2020

BOWMAN AND BROOKE LLP

5 By: /s/Richard L. Stuhlbarg  
6 Richard L. Stuhlbarg  
7 Attorneys for Defendants,  
8 FCA US, LLC and CJM  
AUTOMOTIVE GROUP, INC.

9 DATED: April 15, 2020

GLASSEY SMITH

10 By: /s/Sharon E. Glassey  
11 Sharon E. Glassey, Esq.  
12 Christopher T. Smith, Esq.  
13 Zachary H. Rankin, Esq.  
14 Attorneys for Plaintiffs,  
Angela P. Spegal and Kristopher G.  
Hail

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**[PROPOSED] ORDER\***

Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Defendant CJM AUTOMOTIVE GROUP, INC. should answer or otherwise respond to Plaintiffs' Complaint on or before Thursday, May 6, 2020.

Dated: April 15, 2020

Jennifer L. Thurston  
United States Magistrate Judge

\* In future, counsel SHALL lodge a copy of the proposed order to the appropriate email account as required by Local Rule 137(b).

## **SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this ***JOINT STIPULATION TO EXTEND TIME FOR DEFENDANT CJM AUTOMOTIVE GROUP, INC. TO RESPOND TO PLAINTIFFS' COMPLAINT*** is acceptable to all parties and that I obtained authorization from counsel for all parties for their electronic signatures on this ***JOINT STIPULATION TO EXTEND TIME FOR DEFENDANT CJM AUTOMOTIVE GROUP, INC. TO RESPOND TO PLAINTIFFS' COMPLAINT***.

DATED: April 15, 2020

## BOWMAN AND BROOKE LLP

By: /s/ Richard L. Stuhlbarg  
Richard L. Stuhlbarg  
Attorney for Defendant  
FCA US LLC and

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2020, I filed the foregoing document entitled ***JOINT STIPULATION TO EXTEND TIME FOR DEFENDANT CJM AUTOMOTIVE GROUP, INC. TO RESPOND TO PLAINTIFFS' COMPLAINT*** with the clerk of court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record in this action.

/s/ Richard L. Stuhlbarg  
Richard L. Stuhlbarg